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January 3, 2022

BY ECF

Hon. P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Rene Allard, S4 20 Cr. 163 (PKC)

Dear Judge Castel:

We respectfully write on behalf of defendant Rene Allard to request that the Court extend Mr. Allard's current surrender date of February 7, 2023 by a period of four weeks for medical reasons. The Government consents to this request.

As discussed in the attached letter from his treating physician, Mr. Allard is in the process of receiving medical care for issues relating to each of his feet. He has now undergone one of two surgeries for his feet, and the surgery was successful, but the recovery time has been slightly longer than what the physician initially anticipated it would be. As a result, the physician has advised us that four additional weeks are important to ensure that at the time Mr. Allard reports to prison, he is able to walk normally under his own power.

We understand that the Court already took into account Mr. Allard's medical condition at the time of sentencing in setting his February 7 surrender date, and we do not make this request lightly. However, in light of the information we have received from Mr. Allard's treating physician about the need for more time to ensure that Mr. Allard can walk

*I will grant a
one-time extension of
the surrender date for the
reasons stated in Dr Lerner's
letter from February 7, 2023
to March 7, 2023 at or before
2 pm to the institution designated
by the Bureau of Prisons and,
if none designated, then
to the Marshal for this
district.*

*SO ORDERED
J. Smith, USDJ
1-4-23*

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normally on his own before his period of incarceration begins, we respectfully ask that his surrender date be extended for four weeks.

Thank you for considering this request.

Respectfully submitted,

_____/s/_____

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Attorneys for Rene Allard

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Hon. P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

January 3, 2023

Dear Judge Castel:

I am writing you on behalf of my patient, Rene Allard. He has been under my care since November of 2021. He has had pain in both of his heels, a very common problem that I see many times daily. He was treated conservatively, being given anti-inflammatory therapy and biomechanical control, which was only partially helpful in his course of treatment. By the early Autumn, it was decided that a surgical regimen was now the best choice of therapy. Due to his case, we could not proceed until December 15th.

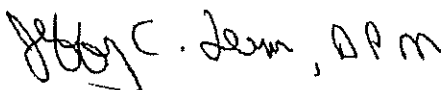
The left foot was first chosen, and a heel spur resection with partial plantar fasciotomy was performed. The surgery proceeded uneventfully. He has thus far had a good post-operative course, although a bit slower than is typical, probably due to his girth. It is always prudent to perform this procedure unilaterally, so as to significantly reduce the chance of post-operative complications, and prevent debilitation, which can possibly result in deep venous thrombosis.

I had planned to correct the right foot, with the same procedures as the left foot, as soon as possible. However, given the slower recovery time from his initial surgery, and my revised expectation of how long it will take him to recover from his second surgery, I would like to request that Mr. Allard's surrender date be extended by an additional four weeks. This additional time would allow me to perform the second procedure knowing that Mr. Allard will have the sufficient additional time he needs to fully recover and to be walking normally on his own before he reports to prison.

I hope you will be kind enough to allow Mr. Allard to undergo the right-side procedure. I truly believe it will allow his incarceration and rehabilitation to be both more humane and more effective.

Please call me at any time, should you have any questions or concerns, at 561-641-7884.

Respectfully,



Jeffrey C. Lerner, DPM